



May 20, 2020

Abuse Department
Network Solutions
12808 Gran Bay Parkway
Jacksonville, Florida 32258

To Whom It May Concern:

I am writing on behalf of the Lawyers' Committee for Civil Rights Under Law ("Lawyers' Committee")¹ to follow up regarding correspondence sent last month concerning two websites, VDARE.com and niggermania.net, to which your company provides registrar services.² As explained in our previous letters, these websites are in clear violation of Web.com's Acceptable Use Policy (AUP).³ We are especially concerned that your company chooses to continue to provide services to these sites given the link between online hateful activity and real world violence, as well as the fact that FBI data show that hate motivated violence is on the rise.⁴

The April 9, 2020 response to our letters informed us that the matters concerning VDARE.com and the n-word sites⁵ are now closed, but failed to address our concerns. The response further noted that,

Web.com will only take action with respect to a particular domain registration pursuant to (i) a request from the current domain name registrant; (ii) the terms of the Uniform Domain Name Dispute Resolution Policy ("UDRP") issued by the Internet Corporation for Assigned Names and Numbers ("ICANN"), the international regulatory body that oversees the administration of domain names; or (iii) an order from a court or arbitral tribunal of competent jurisdiction.

While none of the three situations outlined above apply to VDARE.com or the sites dedicated to uplifting the n-word, we again reiterate that these sites are in violation of your company's AUP. The opening paragraphs of the AUP explain that the AUP, "governs the usage of all products and services" offered by Web.com and its subsidiaries, and that it is "incorporated by reference into each agreement between [the]Company and each of our customers." In addition, the AUP notes

¹The Lawyers' Committee is a nonprofit organization formed in 1963 at the request of President John F. Kennedy to enlist the private bar's leadership and resources in combating racial discrimination and the resulting inequality of opportunity. The Lawyers' Committee's principal mission is to secure equal justice for all through the rule of law, targeting in particular the inequities confronting Black people and other racial and ethnic minorities. The James Byrd Jr. Center to Stop Hate, at the Lawyers' Committee, supports communities and individuals targeted for hate and challenges white supremacy by using creative legal advocacy, disrupting systems that enable hate, and educating the general public and policy makers.

² Network Solutions also provides registrar services to niggermania.net's sister site, niggermania.com

³ <https://assets.web.com/legal/English/AcceptableUsePolicy.pdf>. Network Solutions is a subsidiary of Web.com.

⁴ <https://www.npr.org/2019/11/12/778542614/fbi-reports-dip-in-hate-crimes-but-rise-in-violence>. The link between online hateful activity and real world violence is discussed in more detail in our previous letter.

⁵ To the extent possible, this letter will refrain from using the full form of the racist epithet.



that “[t]he purpose of this Policy is to enhance the quality of the Services, and to protect the Company’s customers and the Internet community as a whole, from illegal, irresponsible, or disruptive Internet activities” and that the “[p]olicy applies to visitors to our Website and to each Customer and its employees, agents, contractors or other users who obtain Services from Company on behalf of the Customer.”⁶

Given that the two sites identified in our previous letters are customers of your company, the AUP clearly applies to them, including the provisions governing termination of services. Furthermore, we have provided ample examples showing that those sites are clearly in violation of the AUP as, in addition to violating other provisions of the AUP, they purposefully display racist, discriminatory and violent content. For instance, in the wake of the coronavirus pandemic, a number of forum threads on the n-word site are dedicated to peddling bigoted, racist and hateful content in violation of Section 3(d)(xiv) of the AUP.⁷ One post on a thread entitled, “The Truth About Why Mo N*ggers Gotz Dat Coronavirus,” explains that African Americans are disproportionately likely to be infected with coronavirus because “N*gger Mammys works in ‘Da Heff Cayuh Sisum’... As ass wipers. They don't wash their hands. They work with CV19 Patients. They bring it HOME to Nigglets and Tenniggers who don't social distance.”⁸ Another post claims that, “Chinks seem to be high-level, advanced niggers with pee-pee skins and straight black hair.”⁹

Other recent posts, like those below, mock the February murder of Ahmaud Arbery, a black runner who was killed after being chased down by a couple white men, and refers to Arbery as “trash” and a “chimpanzee”:

- “[A]s for the two gents who deleted that crimipanzee, may they get heavily recompensed and their guns back as well.”¹⁰
- “[H]e [Arbery] thought he was at a kfc and chimped out.”¹¹
- “We can all be comforted by the fact that Arbery will be observing a permanent silence in his own memory.”¹²

Similarly, VDARE.com continues to peddle anti-immigrant and anti-Black hate. For instance, a May 8th article, claims that “Black people kill white people at a pretty fair clip, often with plain malice and horrific cruelty.”¹³ In addition, as detailed in our previous letter (attached), the site spreads misinformation about the coronavirus and encourages violence against migrants.

⁶ <https://assets.web.com/legal/English/AcceptableUsePolicy.pdf>.

⁷ Section 3(d)(xiv) of the AUP prohibits users from “utilize[ing] the Services in a manner deemed, in Company’s sole discretion, to display bigotry, racism, discrimination, or hatred in any manner whatsoever.”

⁸ <http://niggermania.net/forum/showthread.php?150254-The-truth-about-why-mo-Niggers-gotz-dat-coonaviruz->

⁹ <http://niggermania.net/forum/showthread.php?148899-The-Chinese-Corona-Virus/page2>

¹⁰ <http://niggermania.net/forum/showthread.php?150210-A-moment-of-silence-for-Ahmaud-Arbery/page2>

¹¹ <http://niggermania.net/forum/showthread.php?150141-Georgia-Nigger-are-you-kidding-me>

¹² <http://niggermania.net/forum/showthread.php?150210-A-moment-of-silence-for-Ahmaud-Arbery>

¹³ https://vdare.com/articles/john-derbyshire-establishment-reprising-emmett-till-narrative-again-but-white-lives-don-t-matter?scroll_to_paragraph=10



Given the numerous examples of content violating Web.com's AUP, your April 9th response to our letters is mystifying. We once again request that you immediately terminate services to the sites identified in our previous letters. We will assume you have decided to continue providing services to these sites if we do not hear from you by May 27, 2020. You can reach our office by contacting [REDACTED].

Respectfully,

Kristen Clarke
President and Executive Director
Lawyers' Committee for Civil Rights Under Law

Attachment: April 7, 2020 correspondence from Lawyers' Committee to Web.com



April 7, 2020

Abuse Department
Network Solutions
12808 Gran Bay Parkway
Jacksonville, Florida 32258

To Whom It May Concern:

I am writing on behalf of the Lawyers' Committee for Civil Rights Under Law ("Lawyers' Committee") in regard to a website for which Network Solutions, a subsidiary of Web.com, provides domain registrar services. Niggermania.net is in clear violation of Web.com's Acceptable Use Policy (AUP) as it is rooted in bigotry, racism and hatred.¹⁴ We write to alert you to the violation and to call on Web.com to terminate services with the offending website.

The Lawyers' Committee is a nonprofit organization formed in 1963 at the request of President John F. Kennedy to enlist the private bar's leadership and resources in combating racial discrimination and the resulting inequality of opportunity. The Lawyers' Committee's principal mission is to secure equal justice for all through the rule of law, targeting in particular the inequities confronting Black people and other racial and ethnic minorities. The James Byrd Jr. Center to Stop Hate, at the Lawyers' Committee, supports communities and individuals targeted for hate and challenges white supremacy by using creative legal advocacy, disrupting systems that enable hate, and educating the general public and policy makers.

According to Section 3(d)(xiv) of Web.com's Acceptable Use Policy, a User may not "utilize the Services in a manner deemed, in Company's sole discretion, to display bigotry, racism, discrimination, or hatred in any manner whatsoever." The website at issue here clearly violates this policy; its homepage explains that the site is:

dedicated to spreading the truth and presenting facts about n___. We also have many pages of n___ jokes and racist humor. Please join our forum where the word n___ is not only allowed but encouraged! All races and religions are welcome to join but n__ and n___ sympathizers are not allowed.¹⁵

Countless posts on the site degrade Black people and other minorities and encourage violence. Black people and others are routinely compared to animals or trash, or otherwise dehumanized, and referred to with a vile racist epithet.¹⁶ A representative sample of posts include:

¹⁴ Network Solutions also provides registrar services to niggermania.net's sister site, niggermania.com.

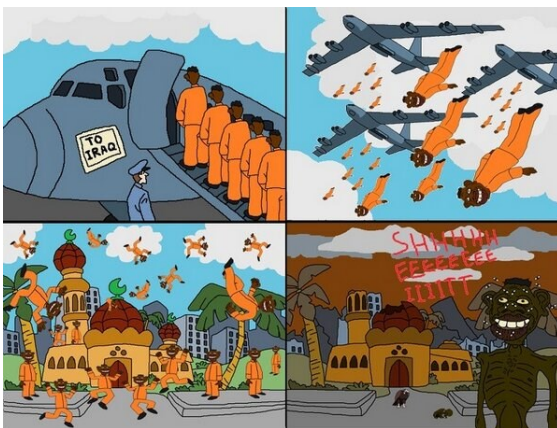
¹⁵ <http://niggermania.net/>

¹⁶ Beyond the name of the website, this letter will refrain from using the full form of the racist epithet.

- Language referring to “feral African N___ beast[s].”
<http://niggermania.net/forum/showthread.php?147530-Sneaky-grimp-catches-a-fart-to-the-face>
- Mockery of the Black Lives Matter movement with the hashtag “#black_lives_are_fecal_matter.” <http://niggermania.net/forum/showthread.php?147275-Multiple-stories-of-nigger-panhandlers-over-the-Christmas-holiday>
- Posts questioning the intelligence of Black people, e.g., “N___ are so stupid--that is, when they are not brutal and mean as well.”
<http://niggermania.net/forum/showthread.php?147491-Had-to-show-Nigger-how-to-do-her-job>

In addition, Section 3(d)(xiii) of Web.com’s Acceptable Use Policy states that “a User may not utilize the Services in any manner deemed, in Company’s sole discretion, to be violent or encouraging violence.” Numerous posts on this website violate this provision, including:

- Posts promoting violent enslavement: “A caged trailer being towed behind the bus is for n___. N___[s] headed right for the nearest major port that has container ships waiting to be packed with 40 million n___ to be sent back where they belong.”
<http://niggermania.net/forum/showthread.php?142410-Screeching-ape-on-the-bus>
- Illustrations glorifying violence against Black people: “Other than releasing n__ back into the wilds of shitty Africa, I can think of only one good use for n___ in the human world....against our enemies: [see picture below of caricatures of Black people being used as bombs].



<http://niggermania.net/forum/showthread.php?142394-Four-months-at-the-zoo>

- Posts comparing Black people to garbage and promoting violence: “They literally are just garbage, an actual waist of space... N___, should be minced up into fertilizer or exhumed in the cheapest most efficient way possible.”
<http://niggermania.net/forum/showthread.php?147661-Feel-Good-Medical-Cocontact-Kicking-a-Nigger-into-the-Afterlife-5>



Racist memes and posts like those found on this website serve a specific function within white supremacist organizing, as they are used to dehumanize minorities, such that violence against them is justified and encouraged. Perpetrators of hate violence against communities of color tend to frequent online platforms such as this website. For example, the shooters who carried out violent attacks in Christchurch, New Zealand, El Paso, Texas, and Charleston, South Carolina were all active on online message forums that shared jokes and otherwise disparaged racial, ethnic, and religious minorities.¹⁷ Even if users want to claim that these posts are harmless jokes, studies have shown that prejudiced jokes can promote discriminatory attitudes.¹⁸

It is clear—even from this website’s declared purpose—that its sole reason for existing is to advance hateful, racist ideologies in undeniable, persistent violation of the AUP of Web.com. As a racial justice organization, we are deeply concerned about the impact this type of speech could have on the targeted communities, other Web.com users, and the public at large. Consequently, Web.com should terminate its relationship with and provision of services to this website and any related sites. We ask that you contact our offices by April 14, 2020, regarding this important issue or we will assume you have decided to continue providing services to this site. You can reach our office by calling [REDACTED].

Respectfully,

Kristen Clarke
President and Executive Director
Lawyers’ Committee for Civil Rights Under Law

¹⁷ Tess Owens, *Decoding the racist memes the alleged New Zealand shooter used to communicate*, VICE NEWS (Mar. 15, 2019), available at https://www.vice.com/en_us/article/vbwn9a/decoding-the-racist-memes-the-new-zealand-shooter-used-to-communicate; Eric Levenson, *This little-known meme site has hosted two mass shooting threats this month*, CNN (Aug. 21, 2019), available at <https://www.cnn.com/2019/08/21/us/ifunny-website-threat-explainer/index.html>; Rachel Hatzipanagos, *How online hate turns into real-life violence*, WASHINGTON POST (Nov. 30, 2018), available at <https://www.washingtonpost.com/nation/2018/11/30/how-online-hate-speech-is-fueling-real-life-violence/>.

¹⁸ For instance, in one study, researchers found that some participants “discriminated against Muslims more after reading anti-Muslim jokes than neutral jokes.” Thomas E. Ford, et al. *Not All Groups Are Equal: Differential Vulnerability of Social Groups to the Prejudice-Releasing Effects of Disparagement Humor*, *Group Processes & Intergroup Relations*, vol. 17, no. 2, Mar. 2014, pp. 178–199, doi:10.1177/1368430213502558.



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To Whom It May Concern:

I am writing on behalf of the Lawyers' Committee for Civil Rights Under Law ("Lawyers' Committee") in regard to a website for which Network Solutions, a subsidiary of Web.com, provides domain registrar services. VDARE.com, a white nationalist anti-immigrant site, is in clear violation of Web.com's Acceptable Use Policy ("AUP") as it has published racist content encouraging violence and hatred against immigrants. Unfortunately, this content is even more dangerous in light of the CoVid19 pandemic, as much of VDARE's content spreads misinformation and encourages discrimination against Asian and Asian-Americans. Additionally, VDARE.com has published personal information of non-consenting individuals, in violation of the Web.com's AUP. We write to alert you to these violations and to call on Web.com to terminate services with the offending website.

The Lawyers' Committee is a nonprofit organization formed in 1963 at the request of President John F. Kennedy to enlist the private bar's leadership and resources in combating racial discrimination and the resulting inequality of opportunity. The Lawyers' Committee's principal mission is to secure equal justice for all through the rule of law, targeting in particular the inequities confronting African Americans and other racial and ethnic minorities. The James Byrd Jr. Center to Stop Hate, at the Lawyers' Committee, supports communities and individuals targeted for hate and challenges white supremacy by using creative legal advocacy, disrupting systems that enable hate, and educating the general public and policy makers.

According to Section 3(d)(xiii) of Web.com's Acceptable Use Policy, "a User may not utilize the Services in any manner deemed, in [the] Company's sole discretion, to be violent or encouraging violence."¹⁹ VDARE.com has violated this policy, as the examples below from the past few weeks demonstrate:

- A blurb in a March 10th article titled "Israel To Greece: Shoot Muslim 'Infiltrators' ...In The Knee. It Works,"²⁰ asks, "Israelis aim for legs while defending border. Why can't we?" The article then begins by explaining that "[t]he Greeks have a problem: how physically to stop the influx of 'Syrian refugees' that Turkey has unleashed upon them" and then answers its own question that, "[f]ortunately, (not for the first time), Israel has provided an answer: shoot these 'infiltrators' ...in the knee. It works."
- A March 12th blog titled "Yes, Mr. President, Border Guards Can Shoot Rock Throwers In Self-Defence," uses hateful rhetoric and calls for lethal force against Mexicans.²¹ The

¹⁹ <https://assets.web.com/legal/English/AcceptableUsePolicy.pdf>

²⁰ <https://vdare.com/articles/the-fulford-file-israel-to-greece-shoot-muslim-infiltrators-in-the-knee-it-works>

²¹ <https://vdare.com/posts/yes-mr-president-border-guards-can-shoot-rock-throwers-in-self-defence>



article begins, “Yes, Mr. President, you can shoot rockers. No, not the music aficionados, but the Mexicans and others who throw rocks at Border Patrol Agents (BPA), or anyone else.”

Furthermore, according to Section 3(c)(i) of Web.com’s Acceptable Use Policy, a User may not “utilize the Services to publish or disseminate information that... publicizes the personal information or likeness of a person without that person’s consent, or [] otherwise violates the privacy rights of any person.” Again, VDARE.com has violated this policy:

- In an article published in March of 2020 Peter Brimelow, VDARE.com’s founder, posted a blog including the name, cell number, and email address of an employee of the Southern Poverty Legal Center (SPLC). The employee’s email address is hyperlinked with the words “email him.” The same article also includes the name, phone number, and hyperlinked email address of a BuzzFeed contributor.²²
- In another article, published on March 26th, the author instructs readers to “Tweet him,” referring to the previously-mentioned SPLC employee and includes a hyperlink to the employee’s Twitter account.²³

In addition to violating the AUP, this type of content raises concerns under both federal and state laws such as, but not limited to, the Code of Virginia § 18.2-152.7:1, which prohibits harassment by computer,²⁴ and 18 USCA § 2261A, which prohibits stalking, including through use of computer services.²⁵

Furthermore, VDARE.com has stoked anti-Asian sentiment related to the CoVid19 pandemic, in violation of Section 3(d)(xiv) of Web.com’s Acceptable Use Policy. This provision states that a User may not “utilize the Services in a manner deemed, in [the] Company’s sole discretion, to display bigotry, racism, discrimination, or hatred in any manner whatsoever.” As the Southern Poverty Law Center notes, VDARE.com has “produced a deluge of propaganda related to the pandemic” with at least 110 posts on the topic since January, with over 50 posts related to the pandemic in just the week of March 16th.²⁶ As illustrated below, many of these posts violate Section 3(d)(xiv):

- At least one post encourages readers to refer to CoVid19 as the “China virus.”²⁷
- A March 17, 2020 post argues that the virus “came into being [] via the unsanitary Chinese habit of eating live bats,”²⁸ even though this is untrue.²⁹ This post also argues that anti-Asian

²² <https://vdare.com/posts/journofa-alarmed-by-vdare-purchase-of-berkeley-springs-castle>

²³ <https://vdare.com/articles/the-fulford-file-splc-thug-michael-hayden-demonizes-vdare-com-s-castle-purchase-his-twitter-followers-plot-violence-where-is-fbi>

²⁴ We understand that Network Solutions is headquartered in Virginia.

²⁵ For a discussion of how this statute may apply to doxing, see Julia M. MacAllister, *The Doxing Dilemma: Seeking a Remedy for the Malicious Publication of Personal Information*, 85 Fordham L. Rev. 2451, 2473 (2017).

²⁶ <https://www.splcenter.org/hatewatch/2020/03/23/white-house-contemplates-coronavirus-asylum-ban-hate-groups-urge-trump-seize-moment>

²⁷ <https://vdare.com/posts/trump-is-right-to-rebrand-corona-as-the-china-virus>

²⁸ <https://vdare.com/articles/the-fulford-file-the-china-virus-came-from-china-and-chinese-people-and-it-s-ok-to-say-so>

²⁹ See <https://foreignpolicy.com/2020/01/27/coronavirus-covid19-dont-blame-bat-soup-for-the-virus/> and <https://www.businessinsider.com/wuhan-coronavirus-sars-bats-animals-to-humans-2020-1>.



discrimination is justified, claiming that the pandemic is “about China’s culture,” and arguing that “‘Xenophobia’ can save your life.”³⁰

- A March 8, 2020 post questions whether anti-Asian hate resulting from the pandemic is real.³¹ The post mocks a Chinese New York Times author of an op-ed for her experience dealing with racism as a result of CoVid-19 and questions whether hateful incidents she describes actually happened (“Generally speaking, these NYT op-eds in which a young lady of color quotes something racist somebody said to the author are awfully improbable.”).

The racist and hateful nature of these posts should be no surprise; one VDARE writer begins a post by acknowledging that “[t]he racial dimension to the Corona virus has fascinated [him] since the outbreak began.”³²

It is clear that this website’s main role is to spread misinformation and hateful ideology in violation of Web.com’s Acceptable Use Policies. As a racial justice organization, we are deeply concerned about the impact this type of activity could have on targeted individuals and communities, other Web.com users, and the public at large. Consequently, Web.com should terminate its relationship with and provision of services to this website.

We ask that you contact our offices by April 14, 2020, regarding this important issue or we will assume you have decided to continue providing services to VDARE.com. You can reach our office by calling [REDACTED].

Respectfully,

Kristen Clarke
President and Executive Director
Lawyers’ Committee for Civil Rights Under Law

³⁰ See, e.g., <https://vdare.com/articles/the-fulford-file-the-china-virus-came-from-china-and-chinese-people-and-it-s-ok-to-say-so>.

³¹ See, e.g., <https://vdare.com/posts/nyt-i-m-chinese-that-doesn-t-mean-i-have-coronavirus>.

³² <https://vdare.com/articles/coronavirus-still-hasn-t-killed-any-whites-not-counting-iranians-new-york-times-ignores-but-concedes-gender-difference-why>